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UNITED STATES BANKRUPTCY COURT
SAN FRANCISCO, CA

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Attorneys for MICHAEL MARROQUIN

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

and

PACIFIC GAS & ELECTRIC COMPANY,

Debtors.

☐ Affects PG&E Corporation

☐ Affects Pacific Gas & Electric Company

☒ Affects both Debtors

*All papers shall be filed in the Lead Case
No. 19-30088 (DM)

Case No. 19-30088-DM

Chapter 11

RS No. LKW-002

Date: December 11, 2019

Time: 10:00 a.m.

Place: 450 Golden Gate Avenue, 16th Floor
San Francisco, CA

Judge: Honorable Dennis Montali

Objection Deadline: December 6, 2019
Time: 4:00 p.m. (Pacific Time)

**NOTICE OF HEARING ON MOTION TO ABSTAIN AND FOR RELIEF FROM
AUTOMATIC STAY TO PERMIT LAWSUIT TO
PROCEED TO TRIAL AND CONCLUSION**

TO DEBTORS, THE UNITED STATES TRUSTEE, AND OTHER INTERESTED PARTIES:

PLEASE TAKE NOTICE that a hearing on the Motion to Abstain and for Relief from Automatic Stay to Permit Lawsuit to Proceed to Trial and Conclusion ("the Motion") filed by MICHAEL MARROQUIN ("Plaintiff") will be heard by the Honorable Dennis Montali on December 11, 2019 at 10:00 a.m. in the United States Bankruptcy Court for the Northern District of California located at 450 Golden Gate Avenue, 16th Floor, San Francisco, California

1 in Courtroom 17. Plaintiff is requesting through the Motion that the Bankruptcy Court (a)
2 abstain from adjudicating Plaintiff's claim against Pacific Gas & Electric Company ("Debtor")
3 and other defendants named in Kern County Superior Court Case No. BCV-18-100020 ("the
4 Lawsuit") and (b) modify the automatic stay so that the Lawsuit can be tried and concluded
5 without any restrictions caused by Debtor filing for relief under the Bankruptcy Code.
6 Plaintiff's claim against Debtor and the other defendants named in the Lawsuit are for personal
7 injuries that arise from an incident that occurred in Kern County, California on or about May 25,
8 2017. Plaintiff's claim is based on claims for Property Damage and Personal Injury caused by
9 the operation of a Motor Vehicle and General Negligence.

10 The Motion is brought per 28 USC Section 1334(c)(1) and 11 USC Section 362(d)(1) for
11 cause. The Motion is based on this Notice, the Motion, the Declarations of Daniel Rodriguez
12 and Leonard K. Welsh filed in support of the Motion and upon all other pleadings and papers on
13 file herein and such oral and documentary evidence as may be presented at the hearing on the
14 Motion.

15 PLEASE TAKE FURTHER NOTICE that the Debtor is advised to appear personally or
16 by counsel at the preliminary hearing as provided in Bankruptcy Local Rule for the Northern
17 District of California 4001-1(a) and that failure to so appear may result in the Court granting the
18 relief requested without further hearing, including the lifting of the automatic stay to allow
19 Plaintiff to pursue completion of litigation, pretrial proceedings, trial, post-trial motions and any
20 appellate proceedings in or in connection with the Lawsuit. Respondent(s) may but will not be
21 required to file responsive pleadings, points and authorities, and declarations in response to the
22 Motion as provided in Bankruptcy Local Rule 4001-1(f)

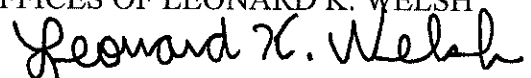
24 PLEASE TAKE FURTHER NOTICE that any opposition or response to the Motion
25 must be in writing, filed with the Bankruptcy Court, and served on the counsel for Plaintiffs at
26 the above-referenced address so as to be received by **no later than 4:00 p.m. (Pacific Time) on**
27
28

1 **December 6, 2019.** Any opposition or response must be filed and served on all "Standard
2 Parties" as defined in the Amended Order Implementing Certain Notice and Case Management
3 Procedures entered by the Court on March 27, 2019 ("Case Management Order"). **Any relief**
4 **requested in the Motion may be granted without a hearing if no opposition is filed a served**
5 **in accordance with the Case Management Order.** In deciding the Motion, the Court may
6 consider any other document filed in these Chapter 11 Cases and related Adversary
7 Proceedings.

8 PLEASE TAKE FURTHER NOTICE that copies of the Motion and its supporting
9 papers can be viewed and/or obtained: (i) by accessing the Court's website at
10 <http://www.canb.uscourts.gov>, (ii) by contacting the Office of the Clerk of the Court at 450
11 Golden Gate Avenue, San Francisco, CA 94102, or (iii) from the Debtor's notice and claims
12 agent, Prime Clerk LLC, at <https://restructuring.primeclerk.com/pge> or by calling (844) 339-
13 4217 for U.S.-based parties; or +1 (929) 333-8977 for International parties or by email at:
14 pgeinfo@primeclerk.com. Note that a PACER password is needed to access documents on the
15 Bankruptcy Court's website.

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17 Date: November 1, 2019

LAW OFFICES OF LEONARD K. WELSH



19 By: /s/ Leonard K. Welsh

20 LEONARD K. WELSH

21 Attorneys for Plaintiff
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